

## UNITED STATES DISTRICT COURT

for the

United States Court  
Southern District of Texas  
FILED

JUN - 3 2019

United States of America

v.

Isaiah Mykal-Lewis Wilson

Case No.

David J. Bradley, Clerk of Court

H19-1020

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 30, 2019 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

Title 18, United States Code,  
Section 111

## Offense Description

Assaulting, resisting, impeding certain officers or employees

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.

Complainant's signature

Christopher Farmer, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: June 3, 2019

Judge's signature

City and state: \_\_\_\_\_

Frances H. Stacy, United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

1. Your Affiant, Christopher J. Farmer, is employed as a federal law enforcement officer with the United States Postal Inspection Service (hereinafter referred to as "USPIS"). Your Affiant has been employed as a federal law enforcement officer since February 2013 and is currently assigned to the Violent Crimes team in the USPIS Houston Division. Your Affiant is responsible for conducting investigations into violent offenses against the United States Postal Service (hereinafter referred to as "USPS") and its employees, including assault. While being employed by the USPIS, your Affiant has conducted investigations and assisted other USPIS and law enforcement agents in investigating individuals that have committed assaults against United States Postal Service employees. Prior to being assigned to the Violent Crimes team, your Affiant was assigned to narcotics investigations for the USPIS in St. Louis, MO for approximately three and a half (3.5) years.
2. This affidavit is made in support of a criminal complaint and arrest warrant charging the defendant, Isaiah Mykal-Lewis Wilson, with: Assaulting, resisting, or impeding certain officers or employees, in violation of 18 U.S.C. § 111 (a)(1).
3. The information contained within this affidavit is based upon information your Affiant has gained from his investigation, his personal observations, his training and experience, and/or information provided to your Affiant by other USPIS investigators and law enforcement officers and/or agents. Because this affidavit is being offered for the limited purpose of supporting a complaint application, it does not contain every fact known to the investigative team, but only those facts necessary to support this application.
4. On or about May 30, 2019, between approximately 12:30 – 12:45 PM, an individual, (now known to law enforcement as Isaiah Mykal-Lewis Wilson, and hereinafter referred to as "Wilson") approached a USPS Letter Carrier (hereinafter referred to as "A.H."), while A.H. was servicing a Neighborhood Delivery & Collection Box Unit in the vicinity of 7910 Erie St., Baytown, TX 77521 (located in the Southern District of Texas). According to A.H., she was outside her vehicle (hereinafter referred to as "the vehicle"), which is further

described as a USPS Long Life Vehicle with visible USPS markings, servicing the mailbox when she observed Wilson standing to the rear of her postal vehicle. A.H. was positioned between the mailbox and her vehicle, which was parked parallel to the mailbox. A.H. asked Wilson if he needed anything and Wilson replied that he would wait until A.H. was finished. A.H. advised she bent over to place a package into the mailbox when she felt the right side of her pants being pulled down. A.H. further advised she turned around and observed Wilson right behind her. According to A.H., Wilson's pants were down and she could feel him trying to penetrate her from behind. A.H. struggled with Wilson and said she scratched and bit Wilson in an effort to get away. A.H. said she had on a Bluetooth headset and stated, "Call 911," thinking the call would connect to police. According to A.H., when Wilson heard this, he fled the scene on a bicycle towards Mohawk St. A.H. was able to take a picture of Wilson on her cellphone before calling her supervisor and 911.

5. A.H. described her attacker, Wilson, as a black male, approximately 17 years of age, skinny, tall, and with a black, high afro-style haircut with the top being orange in color. A.H. described Wilson's clothing as a long-sleeved dark shirt with a bright colored image on the front, blue jeans with a white wash, and black boxers.
6. On or about May 30, 2019, Harris County Sheriff's Office deputies arrived on the scene prior to your Affiant and other USPIS investigators' arrival. Your Affiant made contact with the resident at 7910 Erie St., Baytown, TX 77521. The resident provided access to the surveillance cameras installed on the exterior of their residence. Around the approximate time of occurrence, an individual can be observed arriving in the area on a bicycle and traveling towards the scene of the incident, which is out of view of the camera. A short time later, what appears to be the same individual could be observed departing the area on a bicycle and traveling away from the scene of the incident.
7. On or about May 30, 2019, Harris County Sheriff's Deputies and USPIS Inspector R. Corley found an abandoned bicycle at 7622 Breda Dr., Baytown, TX 77521. Inspector Corley spoke to the resident, who advised they were not familiar with the bicycle. This residence is approximately 0.3 miles away from the scene of the incident.




8. On or about May 30, 2019, your Affiant traveled to Goose Creek Memorial High School and spoke with Goose Creek Independent School District (hereinafter "Goose Creek ISD") Police Officer M. Auzenne. Officer Auzenne was shown the surveillance photos obtained from the resident of 7910 Erie St., as well as provided a description of the attacker provided by A.H. Officer Auzenne recognized the photo and description as being that of Wilson. Officer Auzenne advised Wilson had left school at approximately 11:30 AM that day. Officer Auzenne and other Goose Creek ISD Police/Security personnel were able to retrieve interior surveillance video of Wilson at the school that same day. Your Affiant observed the footage and noted Wilson had the same hairstyle described by A.H., as well as a dark shirt with a colorful/bright design and blue jeans with white wash. The shirt was covered by a white jacket. Around that same time, Inspector M. Larsen was speaking with a resident at 7502 Broken Arrow St., Baytown, TX 77521. Inspector Larsen showed the resident the surveillance photo and provided A.H.'s description of the attacker. Inspector Larsen advised the individual identified Wilson based on the photo and the description.
9. Utilizing available law enforcement resources, your Affiant determined Wilson to reside at 4523 Taino Dr., Baytown, TX 77521. Your Affiant noted that this is approximately 0.5 miles away from the scene of the incident. Your Affiant also noted that 7622 Breda Dr., where the abandoned bicycle was located, is on the line-of-travel between the scene of the incident and Wilson's residence.
10. On or about May 30, 2019, your Affiant and Inspector K. Pacheco made contact with Wilson at 4523 Taino Dr., Baytown, TX 77521. Wilson participated in a *Miranda* interview with your Affiant and Inspector Pacheco. After initially denying making contact with A.H., Wilson admitted to making contact with A.H. by placing his hands on A.H.'s hip and lower back. When asked, Wilson acknowledged the contact was sensual or sexual in nature. According to Wilson, he had walked home from school that day with a friend. After leaving the friend's house, Wilson said he observed A.H. and passed her on foot. Wilson indicated he then found a bicycle and rode back to where A.H. was servicing the mailbox. Wilson said he was standing at the rear of A.H.'s vehicle and she smiled at him. According to Wilson, he then observed A.H. struggling with a package and he went to help her before placing his hands on A.H.'s hip and lower back. Wilson described how A.H.


moved away from him and had an altercation with him, but denied there was a struggle. Wilson denied pulling A.H.'s pants down. Wilson acknowledged he left the area on the bicycle. Wilson was not observed to have any fresh bite marks or scratches on his arms.

11. Based on the foregoing, and my training and experience, I believe that there is probable cause to believe that: On or about May 30, 2019, in the Southern District of Texas, Isaiah Mykal-Lewis Wilson did knowingly and willfully forcibly assault, resist, oppose, impede, intimidate, or interfere with A.H., a person designated in 18 U.S.C. § 1114, while engaged in or on account of the performance of official duties, in violation of 18 U.S.C. § 111 (a)(1).

6/3/2019  
Date

  
Christopher J. Farmer  
U.S. Postal Inspector  
U.S. Postal Inspection Service

Sworn and Subscribed to me this 3 day of June 2019, *and I find probable cause*

  
Frances Stacy  
United States Magistrate Judge  
Southern District of Texas